

July 19, 2019

Via Online Submission & US Mail

Environmental Protection Agency
Office of the Administrator, 1101A
1200 Pennsylvania Avenue, N.W.
Washington DC 20460

Re: **Techalloy
Southern Cal Chemical Company
PhibroTech
1974-2019
In and around Union, Illinois**

Dates of Incident:
Location of Incident:

To whom it may concern:

Our firm, Romanucci & Blandin LLC, represents Dana Harper regarding Techalloy, Southern Cal Chemical Company, and PhibroTech's continued noncompliance with federal and state regulations regarding emissions and/or polluting of neighboring land, air, and water in Union, Illinois. Upon information and belief, Techalloy, Southern Cal Chemical Company, and PhibroTech, three companies located in or around Union, Illinois, released and/or transferred into the surrounding environment amounts of chemicals significantly exceeding limits established by the US and Illinois Environmental Protection Agencies from 1974 up to and after the closing of the companies.

Pursuant to the provisions of the Freedom of Information Act, 5 ILCS 140/1, I am requesting information related to the release and/or transfer of chemicals into the environment by Techalloy, Southern Cal Chemical Company, and PhibroTech between 1974 and 2019.

Specifically, I am requesting any and all:

- 1) Documents, investigations and/or reports created by the US Environmental Protection Agency (EPA) regarding any and all citations for release and/or transfer of chemicals beyond the established allowed amount;
- 2) Any and all correspondence and/or communication created or possessed by the EPA regarding either above-listed company;
- 3) Reports, data and/or diagrams regarding the above-listed companies;
- 4) Meeting minutes and/or documentation of EPA's concern and/or investigation into either of the above-listed companies; and
- 5) Documentation from the Bureau of Air, the Bureau of Land, the Bureau of Water, Chemical Safety, and Pollution Prevention programs regarding the above-listed companies between 1974 and 2019.

I look forward to hearing from you in writing within five working days as required by the Act. Due to the time frame from which I am requesting documents, I acknowledge the vast amount of potential records and propose a rolling disclosure.

If you have any questions or need further information to locate the records, please do not hesitate to contact the undersigned directly at 312.253.8636. Thank you.

Sincerely yours,
ROMANUCCI & BLANDIN, LLC


Ciro Gaimari, Paralegal